UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

21577

In re: Valsartan, Losartan & Irbesartan Products Liability MDL No. 2875

Litigation

WAIVER OF SERVICE OF SUMMONS FOR FIRST AMENDED CONSOLIDATED IRBESARTAN CLASS ACTION COMPLAINT

To: Marlene J. Goldenberg, Esq. Goldenberg Law

Attorneys for Plaintiffs

I have received your request to waive service of a summons in this action along with a copy of the Complaint, two copies of this waiver of service form, and a prepaid means of returning one signed copy of the waiver form to you.

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco Healthcare U.S. LLC, I waive service of the summons and Complaint in this case.

In waiving service of process, Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco Healthcare U.S. LLC, preserve all of their defenses and objections to the lawsuit, the court's jurisdiction, and the venue of the action.

I also understand that the Court has stayed the deadline to serve an answer or a motion under Rule 12 to this Complaint.

DATE: February 18, 2021 By: /s/ Seth A. Goldberg

PARTIES: Zhejiang Huahai **DUANE MORRIS LLP**

Pharmaceutical Co., Ltd., Seth A. Goldberg Huahai U.S., Inc., 30 South 17th Street

Prinston Pharmaceutical Inc., Philadelphia, Pennsylvania 19103

Tel.: (215) 979-1000 and Solco Healthcare U.S. LLC Fax: (215) 979-1020

SAGoldberg@duanemorris.com

Attorneys for Zhejiang Huahai

Pharmaceutical Co, Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco

Healthcare U.S., LLC